

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JESSICA HODGES, as natural guardian of)
minor children, LMC and DLC; ESTATE)
OF LEE MICHAEL CREELY by and)
through Warren Ratchford, its Administrator,)

Plaintiffs,)

vs.)

CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH LLC;)
CORRECTHEALTH CHATHAM, LLC;)
CARLO MUSSO, MD; KAREN)
FORCHETTE; ALFRED NEVELS;)
SELENA CARDONA; TEANNA)
FRANCES-HENDERSON; TERENCE)
JACKSON; DON WHITE; KARLOS)
MANNING; YVETTE BETHEL-)
QUINNEY; LOWRETTA FLORENCE;)
AMBER ANDERSON; JACKIE HARNED;)
SUSAN RIVERA; and LOUIKISHA)
ROBERTS,)

Defendants.)

CASE NO. 4:22-cv-00067-WTM-CLR

SECOND JOINT MOTION TO EXTEND DISCOVERY DEADLINES

COME NOW all parties to the above-captioned matter and, by and through their counsel, jointly request that the current deadlines in this Court's Scheduling Order entered August 23, 2022, be extended as noted below. In support, the parties respectfully show this Court the following:

1. On April 14, 2022, the parties submitted a proposed scheduling order. *Doc. 24.* On February 3, 2020, this Court issued its first Scheduling Order. *Doc. 28.*

2. On August 22, 2022, the parties jointly requested that the first Scheduling Order be amended to extend several deadlines. *Doc. 48*. That request was granted by this Court on August 23, 2022. *Doc. 50*.
3. As stated in the parties' first Joint Motion to Extend Discovery Deadlines, this case involves important constitutional issues and the untimely death of Lee Creely at the Chatham County Detention Center.
4. The parties have diligently pursued discovery since this action was initiated. And, in the time since deadlines were first extended in August, the parties (and experts) have toured the jail and fourteen depositions have been completed (in addition to the parties continuing to engage in written discovery and nonparty document discovery). The depositions included Plaintiff Jessica Hodges, three members of Plaintiff and Lee Creely's family, and ten named Defendants.
5. However, an additional eighteen depositions of either party defendants or critical fact witnesses have been scheduled or are in the process of being scheduled.
6. So, despite the parties' best efforts and consistent coordination, additional fact discovery remains. The parties would therefore be assisted by this Court amending the Scheduling Order to provide the parties with additional time to complete discovery.
7. To that end, the parties propose the following deadlines:
 - Last Day to Conduct Fact Discovery: **December 15, 2022**
 - Last Day to Furnish Expert Witness Reports by Plaintiff: **January 31, 2023**
 - Last Day to Furnish Expert Witness Reports by Defendants: **February 15, 2023**
 - Close of Discovery: **April 14, 2023**
 - Joint Status Report Due: **May 15, 2023**
 - Last Day for Filing Civil Motions Including *Daubert* Motions But Excluding

Motions *In Limine*: **June 2, 2023**

8. This Motion is made in good faith and not for purposes of delay. The parties are cooperating closely with one another to complete discovery and will continue to do so.

RESPECTFULLY SUBMITTED THIS 26th DAY OF OCTOBER, 2022.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, a copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF System addressed as follows:

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